

EXHIBIT 6

ORIGINAL

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DOCKET NO: 04 11572 JLT

SUSAN COONEY,)
Plaintiff,)
v.)
HUMANISTIC PSYCHOLOGY)
INSTITUTE, d/b/a SAYBROOK)
INSTITUTE and MAUREEN O'HARA,)
Individually,)
Defendants.)

)

AUDIOVISUAL DEPOSITION OF SUSAN COONEY, taken
on behalf of the Defendant, pursuant to the applicable
provisions of the Federal Rules of Civil Procedure,
before Marcia Danilecki, Certified Shorthand Reporter
and Notary Public in and for the Commonwealth of
Massachusetts, taken at Morrison Mahoney LLP, 250 Summer
Street, Boston, Massachusetts, on Thursday, January 26,
2006, commencing at 10:16 a.m.

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1 A. (Witness shaking head.)

2 Q. Was it of any concern to you that the people
3 were discussing APA accreditation in the context of
4 licensure options for psychology students?

5 A. No, it wasn't any concern. It seemed like an
6 added thing. Just an added thing. It didn't preclude
7 regular licensing. It was an added thing.

8 Q. Did -- Was it your understanding that the APA
9 accreditation petition would enhance the chances of
10 Saybrook graduates getting licensure in psychology?

11 MR. MORENBERG: Objection.

12 A. No, it didn't. It didn't -- I didn't really
13 get the impression that it would enhance it. The only
14 asset I saw in APA was that when you were off getting a
15 job an APA school is better.

16 Q. That's all.

17 A. That's all.

18 Q. It just had to do with jobs.

19 A. Yeah.

20 Q. It didn't have to do with licensure.

21 MR. MORENBERG: Objection. You can
22 answer.

23 BY MR. VARTAIN:

24 Q. Did it have to do with licensure?

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1 A. No. We were already approved, in my
2 understanding, to get licensed, so whether or not they
3 got APA was irrelevant to me.

4 Q. So you actually made the judgement at that
5 time that you were at this residential conference that
6 it was irrelevant to you in the matter of licensure as
7 to whether or not the school got APA?

8 MR. MORENBERG: Objection.

9 A. That's how I felt, yes.

10 Q. Is that what you understood from the people
11 who were speaking?

12 A. No. You asked what I was feeling.

13 Q. Yeah. From what the people were saying, the
14 Saybrook people at the residential conference --

15 A. Right.

16 Q. -- did APA accreditation have anything to do
17 with the opportunity for graduates in the psychology
18 program to become licensed as psychologists?

19 A. I don't recall them talking about it in that
20 context.

21 Q. So I'm asking you because you put it in that
22 context when you answered your interrogatories. You
23 put --

24 A. Read it again, please. I don't have it in